# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Application Serial No. 76/021,469 Published in the Official Gazette on October 2, 2001 Mark: WASHINGTON PIGSKINS

PRO-FOOTBALL, INC. and NFL PROPERTIES LLC,

Opposers,

Opposition No. 91152156

-against-

DAVID S. CAMPBELL,

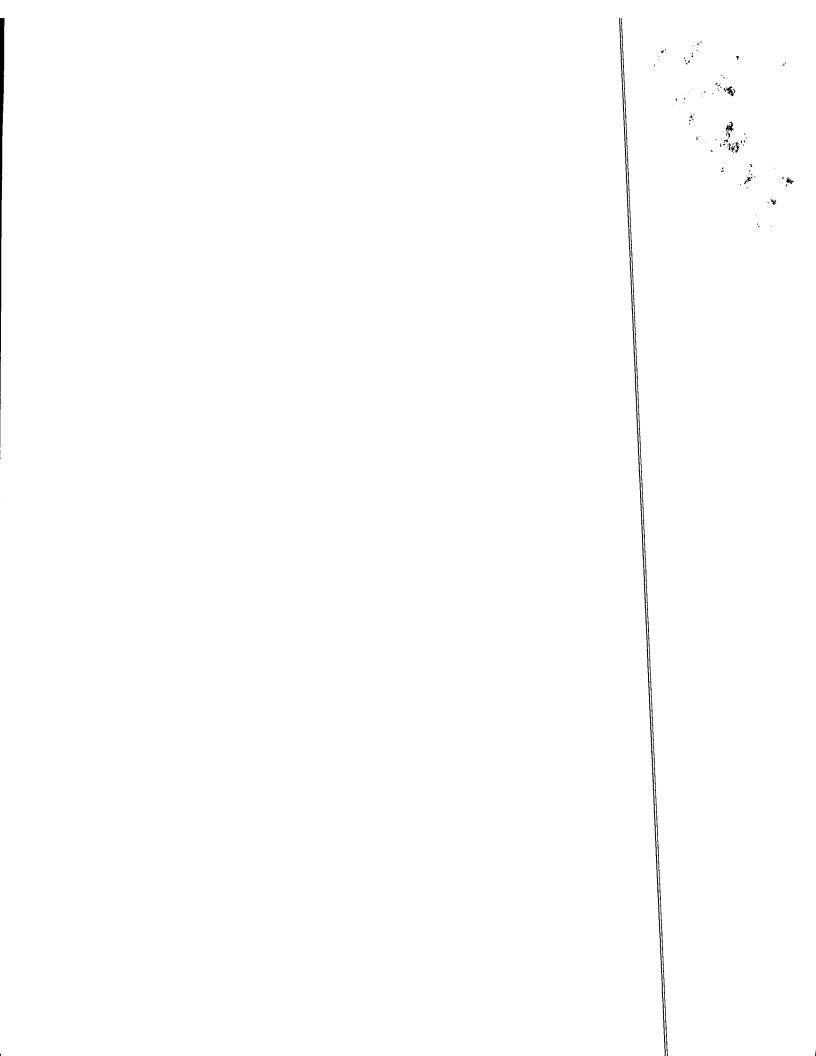
Applicant.

### APPLICANT'S NOTICE OF RELIANCE

PLEASE TAKE NOTICE THAT, as provided in the Trademark Rules of Practice, Applicant offers the following into evidence, and copies of identified documents are submitted with this Notice of Reliance:

1. Trademark Trial and Appeal Board Decision in Suzan Shown Harjo et al v. Pro-Football, Inc., Cancellation No. 21,069 to Registration Nos. 1,606,810; 1,085,092; 987,127; 986,668; 978,824; and 836,122; U.S. Department of Commerce Patent and Trademark Office, Trademark Trial and Appeal Board; (Pursuant to 37 CFR §2.122(e), a copy of an official record of the Patent and Trademark Office need not be certified to be offered in evidence.) Copy attached.

PRINTED PUBLICATIONS AND OFFICIAL RECORDS, pursuant to 37 CFR2.122(e), with copies attached:



2.	Clarke, Liz Redski	ns Offended by	y Remark Was	shington Post 12/19/00
3.	Garber, Greg What's	In A Name?	ESPN.com	11/22/00
4.	On-Kine Interview: Su	usan Harjo	ESPN.com	11/18/00
5.	Looney, Douglas S.	If Team Name	es Offend, Mus	t They Change?
	Christian Science Mon	nitor 4/14/0	0	
6.	Chronology of the American Indian Sports Team Mascot Issue 12/22/00			
7.	Giago, Tim Native	Americans Do	on't Appreciate	Mascot Honor
	Albuquerque J	ournal 8/25/9	7	
8.	Boswell, Thomas	Hard to Cope	With Latest Er	nbarrassment
	Washington Post	12/20/	00	
9.	Klein, Frederick C.	Hailing the C	hief: Illiniwek'	s Last Stand? <u>Wall</u>
	Street Journal	11/17/00		
10.	Wenzl, Roy	'Redskin' Ma	scot Foe Wins	NAACP As Ally <u>The</u>
	Wichita Eagle	9/20/99		
11.	Aschoff, Susan	Protecting Th	eir History and	Sharing Their Plan
	St. Petersburg Times	2/6/00		
12.	Nationwide Campaign to End the Use of "Redskins" Find Another			
	<u>Name.com</u> 1/30/0	1		
13.	Nikoleski, Rob	Commentary:	Redskins Desc	erve a New Name
	The Sporting News	5/26/9	9	
14.	Washington Redskins	Asked to Cha	nge 'Offensive	'Name <u>United</u>
	Methodist News Serv	<u>ice</u> 6/22/0	00	
15.	McKenna, Dave The	R Word Washi	ington City Par	per 4/27-5/3/01

16.	Leibel, Aaron 'Redskins' Offends; Change Name, Says N. Va. Man
	Washington Jewish Week Online Edition 5/3/01 & 6/5/01
17.	Nation's Largest Jewish Organization Urges President of Washington
	Redskins to Change Name Religious Action Center of Reform Judaism
	6/19/00
18.	De Millo, Andrew COG Deplores Redskins' Name <u>Washington</u>
	<u>Post</u> 1/10/02
19.	Harjo, Susan Shown Viewpoint Native Peoples Magazine Summer 1999
	Issue
20.	Harjo, Susan Shown Chief Offenders, Native Peoples Magazine
	Summer 1999 Featured Article
21.	Miller, Bill A Court Battle Over 'Redskins' Name Washington Post
	6/30/00
22.	Radio Show Transcript with Susan Harjo: Morning Edition National
	Public Radio 8/11/00
23.	NAJA: Stop Using Mascots <u>Native American Journalists</u> 3/14/02
24.	Ferrandino, Rita Committee Listens to 'Redkins' Comments Coopers
	<u>Town Crier</u> 1/24/02
25.	Springsteen, Chris Marshall Votes to Do Away With Nickname <u>The</u>
	<u>Enquirer</u> 2/12/02
26.	Lee, Amy Patriotism Rises to Replace Symbol <u>The</u>
	Detroit News 2/17/02

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27.	Lee, Amy	Redskin Mascot Stirs Emotions <u>The</u>		
	Detroit News 2/17/02			
28.	Swanson, Perry	Mascot Watch Greeley (Colorado) Tribune		
	2/12/02			
29.	Sanchez, Rene	Former Redskin Told to Return Team Inspired		
	License Plates Was	hington Post 1/5/02		
30.	NAJA Calls Upon News Media to Stop Using Mascots <u>Native</u>			
	American Journalists Association			
31.	Schwartz, Carol	Name Shame Washington Post 3/3/02		
32.	Lim, Sunamita	The Fight Against Indian Mascot Stereotyping Isn't		
	Over Just Yet Sant	a Fe New Mexican 8/4/02		
33.	Associated Press	Indian Mascot Protestors Vow to Return		
	Albuquerque Journa	1 5/20/02		
34.	Associated Press	Snoqualmie Tribe Tells School to Keep Mascot		
	Santa Fe New Mexi	can 6/6/02		
35.	Baca, Kim Calif	Ornia Might Drop Use of Indian Team Names Santa		
	Fe New Mexican	5/16/02		
36.	Siskind, Lawrence	The Trademark of Cain American Lawyer Media		
	6/11/99			
37.	Legel, Allan	Football Fans Fight State Over License to Offend		
	Washington Post	3/17/00		
38.	Lewerenz, Dan	Indian Mascots Destroy Respect They Are Meant to		
	Instill Student Publications Inc. 10/23/95			

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39.	The Politically Correct Are sure to Tune This World Series Out The
	News and Observer Publishing Co. 10/18/95
40.	Johnson, Chip 'Skins Fan Fighting a Losing Battle San Francisco
	Chronicle 3/7/00
41.	Nakao, Annie Hateful Words Leave Wounds San Francisco Chronicle
	2/27/00
42.	Hood, Joel Time to Drop the Derogatory 'Redskin' Name
	Oregon Daily Emerald 6/4/98
43.	Harjo, Susan Shown The Invisible Americans ABA Journal 3/00
44.	Maske, Mark & Shapiro, Leonard Snyder Intends to Keep the Name
	Redskins Washington Post 5/26/99
45.	Scotti, Ciro Hey Dan Snyder, Rename the Redskins Businessweek
	Online 10/13/99
46.	National Congress of American Indians Applauds "Redskins" Trademark
	Cancellation 4/2/99
47.	Masters, Brooke A. Redskins Are Denied Trademarks <u>Washington</u>
	<u>Post</u> 4/3/99
48.	Uwohilatlitigv (Tsalagi) Redskins: A Name of honor or Racial Slur?
49.	Weingarten, Gene For a Capital Team, a Name That Packs a
	Wallop <u>Washington Post</u> 1/12/99
50.	Moreno, Sylvia 'Redskins' Name Assailed at Hearing Washington
	<u>Post</u> 5/28/98

51. McNutt, Randy Miami RedHawks on Hold

The Cincinnati

Enquirer 2/8/97

## PLEADINGS FILED IN THIS MATTER (COPIES ATTACHED):

52. RECIPROCAL STIPULATION RELATING TO AUTHENTICATION

53. APPLICANT'S REVISED ANSWERS TO OPPOSERS' FIRST SET OF

**INTERROGATORIES** 

Dated: Albuquerque, New Mexico

August 5, 2003

Respectfully submitted,

By: David S. Campbell, Attorney Pro Se 6100 Uptown Blvd NE, Suite 500

Albuquerque, NM 87110

#### **CERTIFICATE OF SERVICE**

I certify that on August 6, 2003, I caused to be served a copy of APPLICANT'S

NOTICE OF RELIANCE by Federal Express, Priority Overnight Service, to LAWRENCE A.

WEINSTEIN, White & Case, LLP, 1155 Avenue of the Americas, New York, New York,

10036.

David S. Campbell

#### CERTIFICATE OF MAILING BY "EXPRESS MAIL"

"Express Mail" mailing number EI103868844US

I hereby certify that this document and instructions for payment of fee is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service in an envelope addressed to the Assistant Commissioner for Trademarks, 2900 Crystal Drive, Arlington, Virginia 22202-3513 on this

6th day of August, 2003.

Signature\_

David S. Campbell

# Vogel Campbell & Blueher, P.C.

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#### EXPRESS MAIL NO. EI103868844US

Assistant Commissioner for Trademarks 2900 Crystal Drive Arlington, Virginia 22202-3513 **BOX TTAB FEE** 

Re:

KAREN HOWDEN WEAVER

In re Application of David S. Campbell: WASHINGTON PIGSKINS,

Serial No. 76/021469

(J)

To the Assistant Commissioner:

I enclose the original of the Applicant's Testimony for Party in Position of Defendant, which is in the form of a Notice of Reliance with exhibits enclosed. Your attention to this matter is appreciated.

Sincerely,

VOGEL CAMPBELL

**A**BLU**E**HER

Enclosure

cc:

Lawrence A. Weinstein, Esq.

Ray Regan, Esq.